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**UNITED STATES DISTRICT COURT**

# **NORTHERN DISTRICT OF CALIFORNIA**

## OAKLAND DIVISION

EPIC GAMES, INC.,

## **Plaintiff, Counter-defendant,**

v.

APPLE INC.,

#### **Defendant, Counterclaimant.**

Case No. 4:20-CV-05640-YGR-TSH

**DECLARATION OF YONATAN EVEN IN  
SUPPORT OF EPIC GAMES, INC.'S  
OBJECTIONS TO SPECIAL MASTER  
DETERMINATIONS ISSUED FEBRUARY  
24 AND MARCH 4 REGARDING APPLE'S  
RE-REVIEWED DOCUMENTS**

Judge: Hon. Yvonne Gonzalez Rogers

1 I, Yonatan Even, declare as follows:

2 1. I am a Partner at Cravath, Swaine & Moore LLP, counsel to Epic Games, Inc.  
3 (“Epic”) in the above-captioned actions. I am admitted to appear before this Court *pro hac vice*.

4 2. I submit this declaration in support of Epic’s Objections to Special Master  
5 Determinations Issued February 24 and March 4 Regarding Apple’s Re-Reviewed Documents  
6 (“Objections”), dated March 10, 2025.

7 3. I have personal, first-hand knowledge of the facts set forth in this Declaration. If  
8 called as a witness, I could and would competently testify to these facts under oath.

9 4. Attached hereto as **Exhibit A** is a true and correct copy of a document that Apple,  
10 Inc. (“Apple”) has produced in this matter with Bates Stamp APL-EG\_11573161, which was  
11 admitted, with redactions, during the Evidentiary Hearings as CX-223.

12 5. Attached hereto as **Exhibit B** is a true and correct copy of a document that Apple  
13 has produced in this matter with Bates Stamp APL-EG\_11573163, which was admitted, with  
14 redactions, during the Evidentiary Hearings as CX-224.

15 6. Attached hereto as **Exhibit C** is a true and correct copy of a document that Apple  
16 has produced in this matter with Bates Stamp APL-EG\_11603962, which was admitted, with  
17 redactions, during the Evidentiary Hearings as CX-291.

18 7. Attached hereto as **Exhibit D** is a true and correct copy of a document that Apple  
19 has produced in this matter with Bates Stamp APL-EG\_10680710, which was admitted, with  
20 redactions, during the Evidentiary Hearings as CX-505.

21 8. Attached hereto as **Exhibit E** is a true and correct copy of a document that Apple  
22 has produced in this matter with Bates Stamp APL-EG\_11395433.

23 9. Attached hereto as **Exhibit F** is a true and correct copy of a document that Apple  
24 has produced in this matter with Bates Stamp APL-EG\_11395435.

25 10. Attached hereto as **Exhibit G** is a true and correct copy of the privilege log entries  
26 provided by Apple for the documents mentioned in the Objections.

1 Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and  
2 correct and that I executed this declaration on March 10, 2025 in New York, New York.

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4 */s/ Yonatan Even*  
5 Yonatan Even  
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## **E-FILING ATTESTATION**

I, Yonatan Even, am the ECF User whose ID and password are being used to file this Declaration of Yonatan Even in Support of Epic's Objections to Special Master Determinations Issued March 10, 2025 Regarding Apple's Re-Reviewed Documents, dated March 10, 2025. In compliance with Civil Local Rule 5-1(i), I hereby attest that concurrence in the filing of this document has been obtained from the signatory.

/s/ Yonatan Even  
Yonatan Even